

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

CLAYTON TAYLOR,

Plaintiff

VS.

CAVALRY PORTFOLIO SERVICES,
LLC, EQUABLE ASCENT FINANCIAL,
LLC, AND THE RETAIL MERCHANTS
ASSOCIATION, INC. D/B/A CREDIT
BUREAU OF LOUISIANA F/K/A
CREDIT BUREAU OF SHREVEPORT,

Defendants.

[illegible]

CIVIL ACTION NO. 4:12-cv-263

DEFENDANT CAVALRY PORTFOLIO SERVICES, LLC'S
INITIAL DISCLOSURES

Defendant Cavalry Portfolio Services, LLC (“Cavalry”) makes these initial disclosures as required by Federal Rule of Civil Procedure 26(a)(1).

A. Individuals with Discoverable Information

The names, addresses, and telephone numbers of individuals likely to have discoverable information that Defendant may use to support its claims or defenses are:

Clayton Taylor
Plaintiff.

Dennis R. Kurz
Weisberg & Meyers, L.L.C.
1200 Smith Street, 16th Floor
Houston, Texas 77002
(512) 436-0036 ext. 412
Counsel for Plaintiff.

Custodians of Records for Cavalry Portfolio Services, LLC
Company Representative of Cavalry Portfolio Services, LLC
c/o David M. Taylor and Mark J. Jung
Thompson, Coe, Cousins & Irons, L.L.P.
700 North Pearl Street, 25th Floor
Dallas, Texas 75201
Telephone: (214) 871-8200
Defendant Cavalry Portfolio Services, LLC, its company representative and custodian of records with knowledge of Plaintiff's claim which is the basis of this lawsuit as well as Cavalry's counterclaim.

Custodians of Records for Equable Ascent Financial, LLC
Company Representative of Equable Ascent Financial, LLC
c/o Keith Wier
Bush & Ramirez, L.L.C.
5615 Kirby Drive, Suite 900
Houston, Texas 77005
Telephone: (713) 626-1555
Defendant Equable Ascent Financial, LLC, its company representative and custodian of records with knowledge of Plaintiff's claim which is the basis of this lawsuit.

B. Relevant Documents & Tangible Things

Relevant items include the account and collection detail maintained by Defendant Cavalry in this matter. The non-privileged responsive documents are available for inspection and photocopying at the office of counsel for Defendant Cavalry at a mutually agreeable time.

C. Information Related to Calculation of Damages

Defendant Cavalry is seeking to recover amounts past due and owing by Plaintiff in the total amount of \$960.82, which consists of \$805.62 in principal and \$155.20 in interest. The interest on this amount continues to accrue. Defendant Cavalry is also seeking to recover its attorney's fees and costs.

D. Insurance Agreements Required To Be Disclosed

None.

Respectfully submitted,

/s/ Mark J. Jung
David M. Taylor
State Bar No. 19687900
Mark J. Jung
State Bar No. 24012934

THOMPSON, COE, COUSINS & IRONS, L.L.P.
Plaza of the Americas
700 N. Pearl Street, Twenty-Fifth Floor
Dallas, Texas 75201-2832
Telephone: (214) 871-8200
Facsimile: (214) 871-8209

ATTORNEYS FOR DEFENDANT CAVALRY
PORTFOLIO SERVICES, LLC

CERTIFICATE OF SERVICE

On August 8, 2012, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Eastern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all known counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Mark J. Jung
Mark J. Jung